



DEPARTMENT OF THE AIR FORCE
OFFICE OF THE CHIEF OF STAFF
WASHINGTON, DC

5 JAN 1998

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Air Force Environment, Safety and Occupational Health Committee (ESOHC)
Meeting Minutes

The AF ESOHC met Dec 15, 1997. Lt Gen Vesely and Mr. McCall co-chaired the meeting. Individuals attending from offices with required membership were as follows:

HQ USAF/RE	Brig Gen Bradley	HQ USAF/SE	Col Bergman
HQ USAF/DP	Ms. O'Neill	HQ USAF/IL	Mr. Orr
SAF/AQR	Col Williams	HQ USAF/JA	Maj Gen Egeland
HQ USAF/ILM	Mr. Williams	HQ USAF/ILS	Col Gunselman
SAF/IG	Col Azukas	SAF/FM	Lt Col Henderson
SAF/GC	Mr. Sheuerman	SAF/LL	Col Bull
HQ USAF/SG	Maj Gen Mabry	NGB/CF	Mr. Van Gasbeck
HQ USAF/ILV	Col Mamaux	HQ USAF/ILE	Mr. Erickson
AFOSI/CC	Col Teller	HQ USAF/XOO	Brig Gen Ward
HQ USAF/XPP	Ms. MacMichael	HQ AFCIC/SC	Ms. Spencer
AFBCA	Mr. Ierardi	SAF/IAX	LtCol McPaerson

Opening Remarks

Gen Vesely and Mr. McCall made brief opening remarks and introduced the three decision briefings the committee was considering.

ESOHC vs. Environmental Protection Committee (EPC) Organizational Recommendation

LtCol John Garland from SAF/MIQ briefed the recommendation from the Overarching Integrated Process (OIPT) team that the committee should formally adopt the expansion of its scope of oversight to include safety and occupational health. The committee has been considering an organizational change of this type since 95. In Aug 96 the committee decided to test the concept at HQ USAF for one year and if successful to implement permanently. LtCol Garland briefed the goals as stated at the test outset and provided examples of the agenda items over the past year that met the test's goals. These examples included the explosive waiver and exemption process, anti-icing and deicing, and hazardous material management. The options considered were to return to an EPC or to adopt the ESOHC concept at HQ USAF level. Gen Vesely thought the hazardous material management was a good example of an integrated approach to an issue. The committee agreed to the recommendation to adopt the ESOHC structure.

ESOHC

#60914

Mr. Orr asked why this was only at the HQ USAF level. LtCol Garland stated there were MAJCOM concerns that EPCs had a full plate with environmental issues and that MAJCOMs would have the flexibility to choose either the ESOHC or the EPC format. Mr. Orr suggested we should review at the end of next year what the MAJCOMs have decided to do. The committee concurred and Gen Vesely stated he wanted a CVA/MIQ memo to the MAJCOMs supporting an integrated ESOHC approach. Gen Egeland advised caution about diluting the EPC focus on environmental programs, reminding the members that the environmental program was successful in part because of commander's attention brought about through EPCs. Gen Bradley stated the AF needs to be as committed to safety and health as it is to the environment. Gen Mabry added that as we continue in a period of limited funds, the AF can make better risk management decisions if it addresses environment, safety, and health in a similar fashion and in a single forum.

AF/ILE will take action to update AFI 32-7005, Environmental Protection Committees. SAF/MIQ will draft a HQ USAF/CVA and SAF/MIQ memo encouraging the MAJCOMs to consider an integrated ESOHC and advising them that we will reexamine the issue of MAJCOM flexibility in Dec 98.

Development Planning MAJCOM Feedback

LtCol Garland briefed on the feedback from MAJCOM CVs on the ESOH Technical Planning Integrated Product (TPIPT) support for Development Planning. Gen Vesely in a 1 Oct 97 memo asked MAJCOM EPCs to comment on the ESOH TPIPT's charter and in particular on the proposed relationship between the Development Planning and the ESOHC/EPCs and the concept of customer funding. All MAJCOMs supported the charter concepts; however, there were some questions about how the ESOH TPIPT interfaces with existing processes and offices. A talker in the committee briefing books provided additional details on the MAJCOM concerns. The briefing recommended the OIPT work with the ESOH TPIPT and reply to the MAJCOM's comments. The briefing also recommended the OIPT and the ESOH TPIPT determine whether a charter is the best way to document the development planning procedures and to advise the committee by Mar 98 of actions taken. The committee agreed with the recommendations, The OIPT and the ESOH TPIPT will take for action.

Environmental Programs Overview

Ms. Teresa Pohlman from HQ USAF/ILEV gave an overview of the environmental programs. She provided the FY 91-03 funding profile and stated our goal was to get out of environmental cleanup by completing cleanups at each installation. She briefed that the AF open enforcement actions (OEAs) were down to 14 with an additional 18 OEA-equivalents overseas. She told the committee that the AF needed the committee's support to emphasize pollution prevention as the preferred approach for achieving compliance. She stated that an end of pipe solution may be more costly and less efficient than a solution that changes the process to eliminate the compliance requirement. She said there was an incorrect perception that a pollution prevention requirement is a "soft" requirement while a compliance requirement is a "must fund." She also briefed the environmental "hot topics" such as Global Warming. The Kyoto Treaty will require a 7% reduction of the global warming gas emissions from the 1990 levels, and that this has some potential to impact


flying hours. Mr. McCall stated that even though the U.S. delegation was unable to secure an exemption for military operations during the Kyoto negotiations, Under Secretary of Defense (Policy) Slocombe had stated the DoD requirement that operations be protected and it was Mr. McCall's understanding that the White House agreed (memo at Atch 2). Mr. McCall stated he would watch treaty implementation closely to protect AF operations. Ms. Pohlman also briefed pollution prevention success stories.

The briefing recommended initiating a joint ILE/FM letter supporting transfer of up to 20% from the Civil Engineer environmental compliance program to pollution prevention in the FY 00-05 POM. It also recommended support for combining compliance and pollution prevention Program Element Codes (PECs). She stated the DoD Comptroller and the Deputy Under Secretary of Defense for Environmental Security had criticized the AF program for failing to put more emphasis and money into pollution prevention solutions. Mr. Orr noted that in addition to Civil Engineering pollution prevention funding, the AF spends significant amounts of money for weapon system pollution prevention and those funds are embedded within the weapon system program elements. Ms. MacMichael stated that the idea and the letter needed to be coordinated with the XP and the corporate structure.

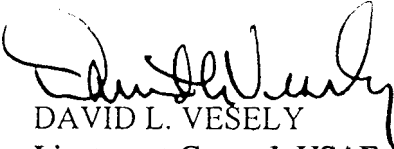
The committee supported the recommendation for the broad shift in emphasis to pollution prevention and for the concept that pollution prevention projects should be "must fund" projects if they are cost-effective and achieve compliance. The committee supported the staffing of an FMB and ILE memo. AF/IOEV will take the recommendations to the corporate structure beginning with the Environmental IPT.

Closing Remarks

Gen Vesely closed the meeting with a request that the ESOHC review the status of the anti-icing and deicing issue. The next meeting will be February 11, 1998 at 1400.



THOMAS W. L. MCCALL, JR.
Deputy Assistant Secretary
of the Air Force
(Environment, Safety and
Occupational Health)



DAVID L. VESELY
Lieutenant General, USAF
Assistant Vice Chief of Staff

Attachments:

1. Briefing Charts
2. Global Warming Memo

DISTRIBUTION':

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 HQ USAF/DPP (w/o Atch)
 HQ USAF/SG (w/o Atch)
 HQ AFBCA/DR (w/o Atch)
 NGB/CF (w/o Atch)

† Distribution and courtesy copies will be made electronically beginning with the Dec 1997 minutes. Please contact LtCol Garland, garland@af.pentagon.mil, DSN 227- 10 19, if you experience difficulties receiving the minutes.

Development Planning MAJCOM Feedback



Development Planning

- . Background:
 - . CVA Requested MAJCOM CV's Review ESOH Technical Planning Integrated Product Team (TPIPT) Charter
 - . MAJCOM EPC Role
 - . Transition to Customer Funding
 - . MAJCOMs Supported Charter Concepts



Development Planning

- . Recommendation
 - . Embrace Concepts
 - . OIPT & TPIPT Representative
 - *Address & Incorporate Comments
 - Determine Action to Institutionalize
 - . OIPT Brief Committee NLT Mar 98

TALKING PAPER

ON

TECHNICAL PLANNING INTEGRATED PROCESS TEAM (TPIPT) CHARTER

COMMENTS

- This talker summarizes MAJCOM CV responses to HQ USAF/CVA memo requesting comments on Environment, Safety, and Occupational Health (ESOH) TPIPT charter
- No MAJCOMs non-concurred
- I-IQ AFSOC, HQ AETC, HQ ACC, HQ AMC, HQ AFCA, and 11th Wing concurred with no substantive comments, questions, or concerns
- HQ AFRC
 - Suggested AF Office of Scientific Research (AFOSR) should be involved in the TPIPT to totally integrate all AF technical and research functions
 - Requested clarification on who would fund a need pervasive throughout the AF
- HQ PACAF
 - Requested clarification on how the TPIPT fits into general funding and oversight process
 - Expressed concern that Environmental Protection Committee (EPC) already has a crowded agenda, but working group reporting to the EPC may be feasible; Safety and Occupational Health issues have not been addressed at EPC
- HQ AFSPC
 - Requested clarification on the interaction with PPBS
 - Requested clarification on the interaction with MAJCOM Mission Support Plan Teams
- HQ USAFE
 - Requested that funding requirements be clearly defined
 - Indicated no manpower or funds have been identified to support new requirements
 - Requested the role of the weapon system single manager be better defined and MAJCOM SC be part of the MAJCOM functional

ESOH vs. EPC Organizational Recommendation



Overarching Integrated Process Team



Background

- Aug 96 HQ EPC, Decided to test the Concept of an ESOH Committee at HQ USAF for One Year
 - Established Overarching Integrated Process Team (OIPT)
 - If Successful, Implement Permanently
- Oct 97, SAF/MIQ Requested Recommendation from OIPT



Goals Stated at Test Outset

- Integrate ESOH Policy and Decision Making Into AF Core Business Practices
- Provide Forum for Issue Advocacy
(e.g. Explosive Safety)
- Obtain Corporate View on Broad Issues
(e.g. Deicing)
- Reduce Air Force Costs Through Better Business Practices
(e.g. Hazmat Pharmacy)



Options

- **Option 1: Establish HQ ESOH Committee**
 - Balance Environment, Safety, and Health Issues
 - AF/ILE Revise and Coordinate AFI 32-7005, Environmental Protection Committees
- **Option 2: Return to HQ EPC**
 - Emphasis on Environment Issues
 - AF/ILE Revise and Coordinate AFI 32-7005



Recommendation

- **Option 1: Establish HQ ESOH Committee**
 - Balance Environment, Safety, and Health Issues
 - AF/ILE Revise and Coordinate AFI 32-7005



Backup Slides



Committee Topics

- 7 EPCs 9509 - 9608

- CE - Pillars, Waste Disposal Policy, Deicing
- AQ - Hazardous Material Reduction
- SG - Compensation, Process Task
- LG - Hazmat
- MIQ - ESOH Summit & Structure

- 7 EPCs 9609 - 9710

- CE - International, Deicing, Ranges
- SGO - Force Health Protection
- SE-ORM& Munitions
- LG - Hazmat
- MIQ ESOH Productivity & Procedures

BULLET BACKGROUND PAPER

ON

SECAF WAIVER/EXEMPTION DIRECTIVE

PURPOSE

- Respond to SECAF directive to convene a team to examine the entire framework for granting waivers and exemptions to explosives safety quantity-distance criteria in Korea with a view to evaluating the current procedures and recommending alternative solutions.

PROBLEM

- Insufficient land on/around bases in Korea to properly store/use munitions
- Korean officials do not enforce their law prohibiting civilians living within 1km of bases
- Over 4,000 waivers/exemptions to explosives safety criteria in Korea
 - Many host nation civilians will be killed in the event of an accidental explosion
 - Significant quantity of assets at additional risk
- SECAF concerned with both the financial and political liability should an accident occur

REQUIREMENTS

- DoD and Air Force explosives safety standards
 - Specify distance from explosives to related and unrelated people
 - Provide mechanism to accept additional risk if necessary for strategic or compelling reasons
- Waiver - Short term deviation from standards (<5 years)
- Exemption - Long term deviation from standards (>5 years)
- SECAF approval required for new construction or additional hazards to foreign nationals

POINT PAPER
ON
DEVELOPMENT OF AIRFIELD DE-ICING / ANTI-ICING GUIDANCE

PURPOSE

Provide background information on the development of the airfield De-Icing/Anti-Icing interim guidance. This effort is co-sponsored by HQ USAF/ILEV, 914th Logistics Wing (Niagara Falls IAP-ARS) and HSC/XRE, Brooks AFB.

BACKGROUND

- Environmental laws governing the airfield operations may impact the aircraft and airfield de-icing/anti-icing activities, thus impacting the airfield operations.
- Many alternative chemicals are available for airfield de-icing/anti-icing, however, their impacts on the environment and airfield operations are unknown.
- Air Force guidance does not exist for the use of alternative de-icing/anti-icing agents that will remedy the concerns over environment and airfield operations.

DISCUSSION

- The Air Force De-icing Working Group is working aircraft and airfield de-icing/anti-icing issues:
 - HQ USAF/ILEV is working with HSC/XRE, HQ AFCEA/CEOM, and 914th Logistics Wing to acquire scientific data necessary to establish the airfield deicing/anti-icing guidance.
 - HSC/XRE has been tasked to coordinate the guidance development effort.
- Airfield Deicing/Anti-Icing Guidance will be developed based on a case study of alternative deicing/anti-icing chemical agents and procedures:
 - HSC/XRE will develop the case study test plan and oversee its execution in close coordination with AFCEA/CEOM;
 - 914th Logistics Group will host the case study at Niagara Falls IAP-ARS, New York;
 - Various Air Force centers of excellence will be involved in the test execution;
 - AFCEE will collaborate on the publication of the De-icing/Anti-icing Guidance

SUMMARY

USAF/ILEV, HSC/XRE and 914th Logistics Group are co-sponsoring the test and evaluation program to acquire the scientific data needed to develop sound Air Force Guidance on airfield de-icing/anti-icing.

BULLET BACKGROUND PAPER
ON
HAZARDOUS MATERIAL PHARMACY

PURPOSE

This paper provides information on the hazardous material pharmacy (HAZMART) program

BACKGROUND

- The Air Force ESOH committee established an HMM IPT to develop an AFI in response to IG Functional Management Review (FMR) to:
 - Provide policy functional areas on Hazardous Material Pharmacy (HMP) roles and responsibilities

DISCUSSION

- AFI was official on 1 August 97 and is posted on the Internet
 - New AFI formalizes the HAZMAT Pharmacy Program
 - Institutionalizes Weapon System HAZMAT Reduction Prioritization Process (HMRPP)
 - Establishes initial ODS management policy
- AFCQMI finishing draft manpower study review
 - Study focuses on partial decentralized pharmacy concept
 - Establishes supply manpower being realigned from supporting supply functions
 - Air Staff will review and analyze all feedback form the MAJCOMs
- AF working with DESCIM PMO to ensure all AF requirements are include into target system
 - FWG currently incorporating EMIS, EN-TRAC ,and DM-HMMS functional requirements.
 - Current estimates for initial release of system (EIM 1 .0) is December 1998

RECOMMENDATION

- None - for information only

Maj Mills/AF/ILEVQ/697-2550/2 December 1997

Compliance & Pollution Prevention Overview



Ms Teresa Pohlman
Environmental Division

15 Dec 97



Overview

- Program Principles
- Compliance
- Pollution Prevention
- Recommendation



Environmental Program Principles

The Four Pillars

- Cleanup
- Compliance
- Pollution Prevention
- Conservation



Sustain Readiness

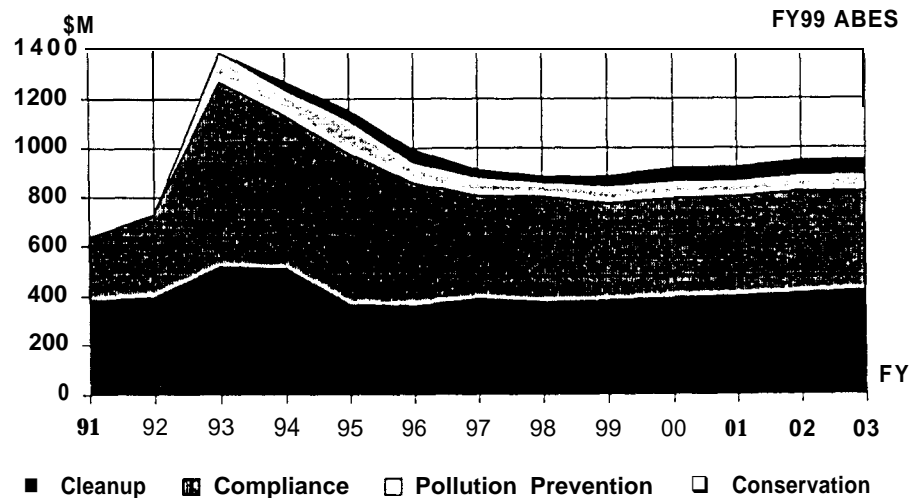
Be a Good Neighbor

Make smart business decisions and bring technology to bear

“Doing the right thing...and doing it right.”



FY91-03 Environmental Funding Profile





Compliance

Goals

Ensure our present operations comply with all applicable environmental standards. No notices of violation is the measure of merit.

Strategy

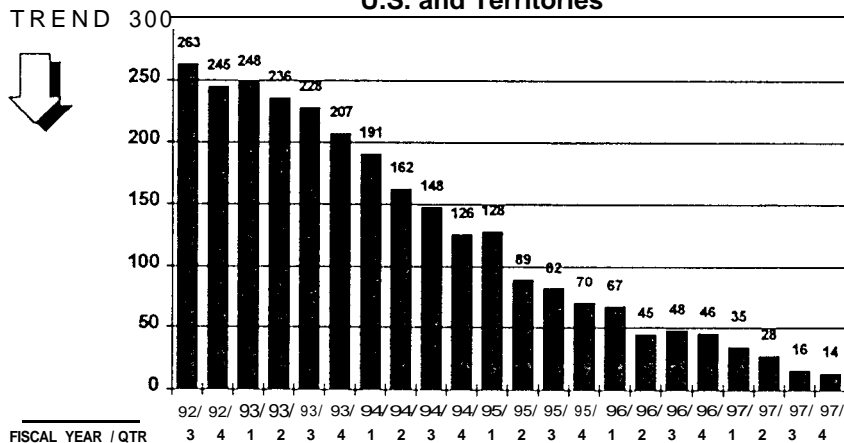
- Aggressively Manage Closure of Remaining Open Enforcement Actions
- Emphasize Pollution Prevention Approaches to:
 - Return to Compliance
 - Maintain Compliance
 - Meet New Legal Requirements



Compliance Performance

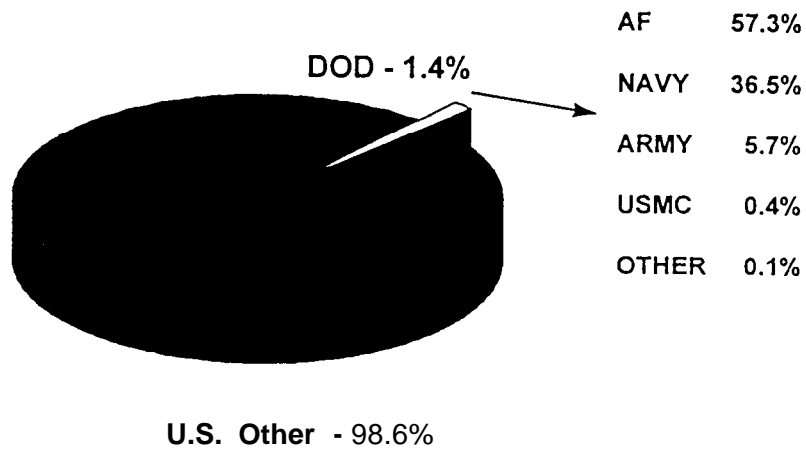
Number of Open Enforcement Actions U.S. and Territories

DESIRED
TREND

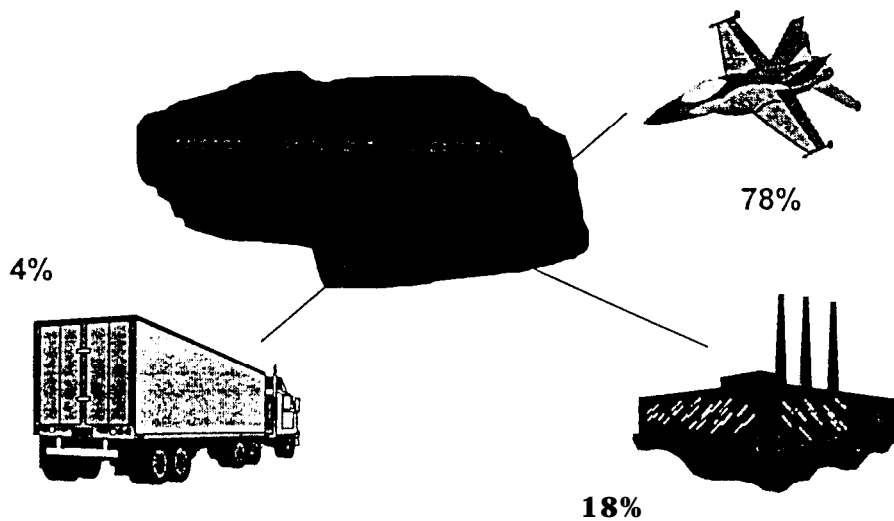




Hot Topic-- Global Warming



Hot Topic-- Global Warming Players





International Programs

- Increased Involvement in Bilateral Agreements
 - US - Foreign Education Exchange
- Completion/Revision of Overseas Environmental Baseline Guidance Document or Final Governing Standards
 - May Drive New Requirements Overseas
- Publication of AF Environmental Handbook for Contingency Operations
- Joint Environmental Doctrine



Pollution Prevention

Goals

Prevent future pollution by reducing hazardous material use and releases of pollutants into the environment to as near zero as feasible.

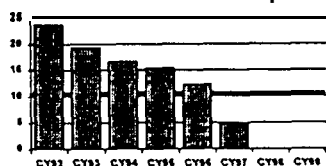
Strategy

- Permeate all Mission Areas with the P2 Ethic-Education, *Training and Awareness*
- Institutionalize Pollution Prevention into all Phases of the *Weapon System* Life Cycle
- Incorporate Pollution Prevention in all Aspects of *Installation Operations*
- Develop and Transition Innovative Pollution Prevention *Technologies* to the Field

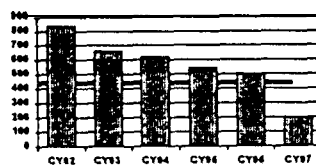


Pollution Prevention Metrics

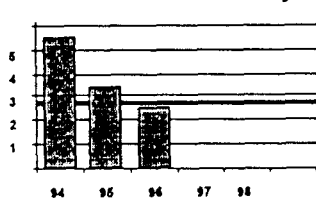
Hazardous Waste Disposal



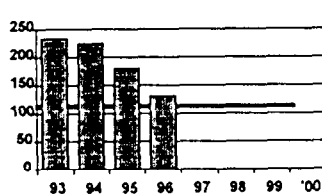
Solid Waste Disposal



Toxic Release Inventory



Pesticide Use Reduction

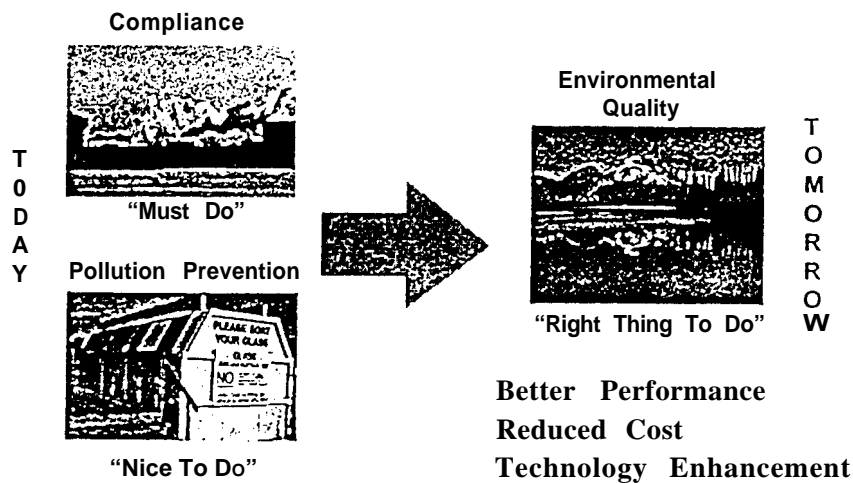


Success Stories

- Declining Enforcement Actions at installations
- Shop Level P2 Training
- Hazardous Material Pharmacy Implementation
- State P2 Partnerships
- ENVVEST
- Permit Elimination Program
- P2 Policy and Toolkit
- Weapon System Pollution Prevention
- Russian Bilateral



Perceptions



Environmental Quality Redefined

- **Compliance Through P2**
 - Utilize P2 to Achieve Compliance
 - P2 Reduces Future Compliance Cost & Liability
 - Look for P2 Investment Opportunities
 - Reduce Permitted Sources
 - HW/SW Disposal Reduction
 - Best Management Practices
 - Transfer Compliance Funds to P2
- **Joint ILE/FMB Letter to MAJCOMs Supporting Transfer of Funds**



Recommendation

- **ESOH Committee Endorse the Concept of Compliance through Pollution Prevention**
 - **Initiate Joint ILE/FM Letter Supporting Transfer of Environmental Compliance to Pollution Prevention in FY00-05 POM**
 - **Support Combining Environmental Compliance and Pollution Prevention Program Element Codes (PECs) into one PEC in the future**



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

20 NOV 1997

MEMORANDUM FOR ALMAJCOM/CE
HQ USAFA/CE

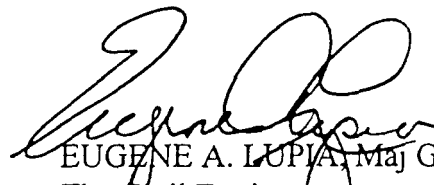
FROM: HQ USAF/ILE
1260 Air Force Pentagon
Washington, DC 20330-1260

SUBJECT: Pollution Prevention to Achieve Compliance

Over the past several years, we have promoted the concept and strategy of pollution prevention (P2)-focusing on eliminating or modifying processes that produce adverse environmental impacts. There have been many successes, but we have not fully embraced pollution prevention investments in our resource identification and allocation processes. Given our fiscally-constrained budget, pollution prevention is preferred over more costly treatment technologies, regulatory reporting and disposal procedures.

We encourage aggressive pursuit of cost-effective pollution prevention projects and activities that reduce future budget requirements without deferring Class (Level) 0 and 1 requirements. With this commitment, we challenge you to increase your P2 funding requirements by 20 percent with a corresponding 20 percent decrease (or more) in environmental compliance requirements by FY03. FY96 compliance and P2 costs, less manpower and training, serve as the baseline.

We look forward to seeing your progress in meeting these objectives during program management reviews and formal budget and POM submissions. When cost-effective, pollution prevention must be used to keep the Air Force in compliance and reduce our overall environmental costs.


EUGENE A. LUPIA, Maj Gen, USAF
The Civil Engineer
DCS/Installations & Logistics

cc:
HQ AFCEE/CC



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC

12 SEP 97

MEMORANDUM FOR ALMAJCOM/CEV
USAF/CEV

FROM: HQ USAFALEV
1260 Air Force Pentagon
Washington, DC 20330-1260


SUBJECT: Pollution Prevention Funding Guidance

The attached funding guidance (attachment 1) supplements AFI 32-700 1, *Environmental Budgeting*, for pollution prevention (P2) program development and budgeting. As we said in our 20 Aug 97 Pollution Prevention to Achieve Compliance memorandum, AF policy is to use cost effective P2 projects and activities to correct and prevent environmental non-compliance. P2 is the preferred approach to compliance and best supports our goal to reduce environmental and mission support costs.,

Our approach to environmental compliance always applies the environmental management hierarchy to determine the "optimal" compliance solution-- regardless of EQ Class designations and Program Element Code. This guidance provides examples of projects and activities eligible for P2 funding to assist in programming and budgeting, and should be used with Clean Air Act and Safe Drinking Water Act programming guidance already provided to you. If circumstances drive different compliance solutions than those contained in this guidance, the environmental management hierarchy serves as the default for making funding determinations. Non-recurring P2 examples in the tables should be designated as Class I, II, or III using the OSD Class definition framework at attachment 2.

Many P2 opportunities with the greatest potential to reduce compliance cost will involve weapon system operation and maintenance activities. Developing these P2 opportunities requires coordinated maintenance and single manager community budget submissions through weapon system program elements (see AFI 32-7086, *Hazardous Materials Management*, Ch 3).

If the members of your staff have any questions, please have them contact Maj Bryan Bodner, AF/ILEVQ, DSN 227-3360 or Maj Keith Yaktus, AF/ILEVA, DSN 227-3322.


TERESA R. POHLMAN
Chief, Environmental Division
DCS/Installations & Logistics



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC

2 0 AUG 1997

**MEMORANDUM FOR ALMAJCOMKEV
USAF/CEV**

FROM: HQ USAF/ILEV
1260 Air Force Pentagon
Washington, DC 20330-1260

SUBJECT: Pollution Prevention to Achieve Compliance

Over the past year, we have experienced increased scrutiny and strain on the environmental quality (EQ) budget. Although we have made great strides in our traditional "pillar" approaches, our next challenge is to ensure compliance and pollution prevention (P2) functions at all levels work together to identify and fund the best environmental solution with available EQ resources. This memorandum reemphasizes our commitment to "compliance through pollution prevention" and asks for your continued leadership. /

It is Air Force policy to use P2 as the first choice to meet new legal requirements, ensure adherence with existing compliance requirements, and return to adherence when violations are identified. Pollution prevention requirements must no longer be narrowly interpreted as "goal-driven." Compliance requirements drive P2 (source reduction and recycling/reuse) as well as traditional compliance (end-of-pipe treatment and disposal) solutions. The environmental management hierarchy (source reduction, recycling/reuse, treatment, disposal) must be applied when developing solutions for every potential compliance requirement.

The AF Corporate Board has deferred all Class (Level) II EQ requirements to use as a "bill payer" until they become Class I. P2 solutions to environmental compliance are now being recognized as a cost-effective means of reducing command and control enforcement restrictions on the mission. As we pursue this policy aggressively, P2 projects and activities will become the major EQ investment while traditional end-of-pipe environmental compliance (EC) activities will experience a decrement equal to or greater than the P2 increase.

We encourage commands and installations to take a cross-functional approach in critically reviewing 100 percent of your recurring and non-recurring EC budget requirements to implement this policy. First, we request you ensure program requirements are properly classified as P2 or EC. Second, we request you apply the environmental management hierarchy and actively seek to meet, reduce, or eliminate a compliance requirement through P2. Although FY98/99 program requirements have been submitted, each command should consider realigning their EQ program if P2 projects are to be executed in FY98 or FY99 to bring a facility into compliance, either now or in the future. Future year P2 projects and activities must be programmed in the upcoming FY00-05 POM.

As your staff works with process owners to review, identify, and program P2 projects that meet or eliminate a compliance management, treatment, or disposal requirement, consider compliance drivers in all areas. These areas include water, air, storage tanks, PCBs, permits, sampling, analysis and monitoring solid waste, hazardous waste, and EPCRA/TRI reporting. Each of these areas contain specific requirements mandated through laws, regulations, policies, and executive orders (and overseas equivalents) that are targets of opportunity for compliance through P2. The three examples at attachment 1 illustrate the connection that can be made between compliance drivers and P2 solutions.

The EQ Class definitions at attachment 2 must be used for programming and budgeting your EQ requirements. Consistent with our policy, these Class definitions stress P2 as the preferred approach to compliance. Non-recurring pollution prevention projects and activities (primarily Class I) should be used to reduce or eliminate a significant portion of recurring (typically EC Class 0) activities such as hazardous waste disposal, permits, fees, sampling, analysis, monitoring, and record-keeping; and to meet a compliance requirement in general. In some cases this may require cooperative compliance agreements or memoranda of understandings with state and local regulatory partners that will allow us to implement pollution reduction measures instead of administrative enforcement-similar to what we are doing with ENVVEST. To help in the distinction between Class I and II P2 projects and activities, we suggest you consider the nature (enforcement vulnerability, cost, manpower) of the compliance requirement, the execution strategy and timing necessary to meet or eliminate it, and the cost-effectiveness and liability reduction aspects of the P2 solution. Installations should continue to capture Class II requirements for future funding. /

There are many tools available to assist in building and implementing an EQ program based largely on P2 projects and activities and we are in the process of developing more tools. HQ AFCEE/EQ, and the Regional Environmental Offices can help you access these tools. We will be providing you with further program and funding guidance by 15 Sep 97 to assist your project development and programming efforts, and expect to see migration into P2 in the FY00 05 POM and subsequent Program Management Review updates. Lt Col Scott Streifert of my staff, DSN 227-3341, and Col Pat Fink, HQ AFCEE/EQ, DSN 240-3332 stand ready to assist you.



TERESA R. POHLMAN
Chief, Environmental Division
DCS/Installations & Logistics

Attachments:

1. Compliance Through P2 Examples
2. EQ Class (Level) Definitions

cc:

SAF/MIQ

HQ AFCEE/EQ